

From: [Shawn Allyn](#)
To: [Jacqueline Promislo](#)
Cc: [jeanne liddy](#); [John McDonough](#)
Subject: Re: Hominski: request for extension to respond to Plaintiffs' Request for Admissions [IMAN-NY_FL_PA_CLIENT_WORK.FID31458]
Date: Friday, November 7, 2025 4:19:28 PM
Attachments: [image001.png](#)

Please do and I will explain why.

I am sick of your threats and your ethical implications.

I have now asked the court to address it as you are aware.
You will continue.

I will produce my flight information since you now claim I misrepresented that I didn't have a flight. Bizzare behavior.

Why don't you stop emailing and answer the admissions ? They will be deemed admitted.

Notable, you fail to respond to inoperable links which expire on Monday.

/s/ Shawn P. Allyn

Shawn P. Allyn
Allyn & Ball, P.C.
57 Suffolk Street
Suite 200
Holyoke, MA 01040
Tel: 413-538-7118
Fax: 413 -538-6199

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On Nov 7, 2025, at 4:07 PM, Jacqueline Promislo
<jpromislo@londonfischer.com> wrote:

Shawn,

To be clear, feel free to review the Court transcript of the hearing before making any material misrepresentations. It appears that this is not the first time you have made misrepresentations, including to a Federal Court. As you may recall, you requested to leave to catch your flight and while there was then a pending question, Jeanne advised the judge that she had to go attend to a sick family member.

Plaintiffs' production remains non-compliant and Jeanne has finally agreed just this afternoon to follow up and provide additional information.

We will advise Judge Elfenbein of your refusal to grant the professional courtesy of a brief extension to respond to discovery.

Jackie

Jacqueline Promislo
Managing Partner, Philadelphia
London Fischer LLP
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<image001.png>

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From: Shawn Allyn <sallyn@allynandball.com>

Sent: Friday, November 7, 2025 3:55 PM

To: Jacqueline Promislo <JPromislo@londonfischer.com>

Cc: jeanne liddy <liddylaw2005@yahoo.com>; John McDonough <JMcDonough@londonfischer.com>; Danielle Karcich <DKarcich@londonfischer.com>

Subject: Re: Hominski: request for extension to respond to Plaintiffs' Request for Admissions [IMAN-NY_FL_PA_CLIENT_WORK.FID31458]

**** External Email ****

This email originated from outside of our organization. Do not click any links or open any attachments unless you recognize the sender and know the content is safe.

What are talking about ?

The court ended the hearing after noting you wasted the court's time.

I hold you responsible for the inoperable links sent by an atty who does Not have an appearance in case.

You further misrepresented our position i. your response to the court. I have asked to address this in my original response.

All this time to email but not respond to Admissions!

/s/ Shawn P. Allyn

Shawn P. Allyn
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On Nov 7, 2025, at 3:48 PM, Jacqueline Promislo
<jpromislo@londonfischer.com> wrote:

Jeanne,

Your discourteous conduct and comment is truly appalling and unprofessional. I simply advised that the Judge had asked you to explain the voice memos when you advised you had to go and the Judge asked my position. I advised that I would extend a professional courtesy.

We shall see the Judge's position with your email below.

Jackie

Jacqueline Promislo
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From: jeanne liddy <liddylaw2005@yahoo.com>

Sent: Friday, November 7, 2025 3:44 PM

To: Jacqueline Promislo <JPromislo@londonfischer.com>; Shawn Allyn <sallyn@allynandball.com>

Cc: Danielle Karcich <DKarcich@londonfischer.com>

Subject: Re: Hominski: request for extension to respond to Plaintiffs' Request for Admissions [IMAN-NY_FL_PA_CLIENT_WORK.FID31458]

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Jackie:

You have done nothing but throw it in my face about my leaving the hearing at 5:45 when I have an ill family member to attend to/animals and you spent hours at hearing wasting everyone's time.

You should co suffer the manner in which you treat others and your conduct.

[Sent from Yahoo Mail for iPhone](#)

On Friday, November 7, 2025, 3:41 PM, Jacqueline Promislo

<JPromislo@londonfischer.com> wrote:

Shawn and Jeanne,

Perhaps you do not understand the meaning of professional courtesy, such as my agreement that you be permitted to leave the discovery hearing. We all have things going on in our lives. Your comments below are false and in fact, the expert discovery we have requested is what is necessary, yet you refuse.

I highly recommend you reconsider your position on our request for an extension.

Jackie

Jacqueline Promislo

Managing Partner, Philadelphia

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From: jeanne liddy <liddylaw2005@yahoo.com>
Sent: Friday, November 7, 2025 3:39 PM
To: Shawn Allyn <sallyn@allynandball.com>;
Jacqueline Promislo <JPromislo@londonfischer.com>
Cc: Danielle Karcich <DKarcich@londonfischer.com>
Subject: Re: Hominski: request for extension to respond to Plaintiffs' Request for Admissions [IMAN-NY_FL_PA_CLIENT_WORK.FID31458]

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As noted in the conference today, that is my position as well.

[Sent from Yahoo Mail for iPhone](#)

On Friday, November 7, 2025, 3:35 PM, Shawn Allyn <sallyn@allynandball.com> wrote:

Dear Atty Promislo:

Due to your bad -faith conduct in discovery; withholding discovery; wrongfully limiting discovery and delaying our experts ability to complete assessment on this case; your request is

Denied.

We further need your responses with respect to the discovery hearing we have requested as they are directly related to the PODs and issues raised, which of course you know already.

I would be remised not to mention that you have had time to send me over 40 emails since the last hearing lodging ethical threats and threats to go to Chambers, misrepresentations and the like, and ample to simply admit or deny the request.

Please do not proceed to email all weekend.

Thank you.

/s/ Shawn P. Allyn

Shawn P. Allyn
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On Nov 7, 2025, at 3:21 PM,
Jacqueline Promislo
<jpromislo@londonfischer.com>
wrote:

Shawn and Jeanne,

Wayfair requests the professional courtesy of a 30-day extension of time to respond to Plaintiffs' Request for Admissions.

Please confirm.

Thank you,

Jackie

Jacqueline Promislo
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From: [Shawn Allyn](#)
To: [Jacqueline Promislo](#)
Cc: [jeanne liddy](#); [John McDonough](#); [Jacqueline Promislo](#)
Subject: Re: Hominski v. Wayfair, et al - Wayfair's Supplement Responses to Requests for Production and Supplemental Production
Date: Friday, November 7, 2025 9:47:04 AM
Attachments: [image001.png](#)
[image001.png](#)
[Mimecast Large File Send \(keyless\).msg](#)

Jackie

Does not open. Does not work. Please produce documents in format that can be downloaded and read

/s/ Shawn P. Allyn

Shawn P. Allyn
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On Nov 7, 2025, at 9:26 AM, Danielle Karcich <DKarcich@londonfischer.com> wrote:

I'm using Mimecast to share large files with you. Please see the attached instructions.

Jeanne and Shawn,

Attached, please find Wayfair's Supplemental Responses to Requests for Production and supplemental document production.

Please let me know if you have any issues opening the files.

Danielle

Danielle M. Karcich (she/her)
Associate
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Shawn Allyn

From: Shawn Allyn
Sent: Thursday, November 6, 2025 2:42 PM
To: 'Jacqueline Promislo'; jeanne liddy
Cc: Danielle Karcich; John McDonough
Subject: RE: Your Misleading claim: HOMINSKI- meet and confer to review additional specific examples of Plaintiffs' deficiencies to which no response has been provided [IMAN-NY_FL_PA_CLIENT_WORK.FID31458]

Ms. Promislo:

I asked you since last week to provides dates so I can get my client's motions heard. You have ignored all the request in addition to writing that the Judge said she must rule on your alleged ESI issues before she would hear my client's motion to compel. This is not true.

A meet and confer was ordered and one is scheduled. If you recall, you were offered help in the last meet and confer and you said "I don't need your help this is a meet and confer." It was clear from your chart that you did not understand or even access parts of the share file.

As to conferring on new trial dates- like I asked to on 10/24/25- I suggested we wait until Gusar can weigh in on a new trial date. You wrote they are not getting counsel – the court ordered them to get counsel.

The rest of your email is self serving and I wont respond to it.

As to unprofessional conduct, I have repeated asked you to STOP and you wont with your ethic threats and threats to go to chambers It is abusive and it has to be addressed.

/s/ Shawn P. Allyn

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